

### **REMARKS**

Applicant has carefully reviewed the final Office Action mailed December 10, 2008, and thanks Examiner Johnson for the detailed review of the pending claims. Applicants' representative further wishes to thank Examiner Johnson for extending the courtesy of a telephonic Interview on March 9, 2009, during which the prior art of record was discussed, in particular U.S. Patent No. 4,378,959 to Susnjara (hereinafter "Susnjara"). During the Interview the Examiner provided guidance regarding amendments to independent claims 13, 26, and 33 to clarify the subject matter contained therein and traverse the pending rejections.

Applicants have therefore amended the independent claims consistent with the understanding provided by the Examiner, and thus respectfully traverse the pending rejections under Section 102 and Section 112, as described further below. Further, Applicants have canceled claims 38-40 without prejudice or disclaimer of the subject matter recited therein, thereby rendering the remaining claim rejections under Section 112 moot. Support for the amendments can be found throughout the specification and drawings as originally filed, as further described below. Accordingly, claims 13, 15, 19, 21, 22, 24-27, 30, 33-37, and 41 remain pending.

At least for the reasons set forth below, Applicant believes the pending claims are allowable over the references of record. Further, Applicant believes that there are also reasons other than those set forth below why the pending claims are patentable, and reserves the right to set forth those reasons, and to argue for the patentability of claims not explicitly addressed herein, in future papers.

### **Claim Rejections – 35 U.S.C §112**

The Office Action rejected claims 13, 15, 19, 21, 22, 24-27, 30, and 33-41 under 35 U.S.C. 102(b) as being allegedly anticipated by Susnjara. This rejection is respectfully traversed.

The Office Action alleged that claims 13, 26, and 33 were indefinite "because it is unclear how to interpret the limitation "an arm axis of rotation defined by the arm." The amendments to claims 13, 26, and 33 remove this recitation, and Applicants thus respectfully submit that the rejection of claims 13, 26, and 33 is rendered moot. Further, claims 38-40 have

been canceled without prejudice or disclaimer of the subject matter recited therein, thereby also respectfully rendering the rejection of these claims moot. Withdrawal of the present rejection is therefore respectfully requested.

### **Claim Rejections – 35 U.S.C §102**

The Office Action rejected claims 13, 15, 19, 21, 22, 24-27, 30, and 33-41 under 35 U.S.C. 102(b) as being allegedly anticipated by Susnjara. This rejection is respectfully traversed.

#### ***A. Independent Claims***

Independent claims 13 and 33 have been amended, and now recite, in part:

a wrist having a first member concentrically attached to the robot arm along the axial path and rotatably moveable with respect to the arm such that the wrist revolves with respect to the arm about the axial path, the axial path extending along a longitudinal axis of the arm; at least one robot line positioned along the axial path; [and] a bellows positioned along the axial path connected to the line and the robot arm allowing extension or compression of the line along the axial path... (Emphasis added)

Independent claim 26 has been similarly amended, and now recites, in part:

a wrist attached to the arm and rotatable with respect to the arm such that the wrist revolves with respect to the arm about a longitudinal axis of the arm, the longitudinal axis of the arm extending along a portion of the axial path... at least one robot line passing from the robot arm through the mounting plate hole and the wrist along the axial path; [and] an axially displaceable bellows positioned along the axial path around a portion of the at least one line, the bellows is connected to the line and the mounting plate... (Emphasis added)

Support for the amendments to claims 13, 26, and 33 can be found throughout the specification and drawings as originally filed, at least at paragraph [0023] and [0040] of the specification, and FIGS. 1 and 4 of the drawings. Susnjara fails to teach or suggest such an arrangement.

More specifically, Susnjara discloses an apparatus for performing work functions that includes members that are angularly displaceable with respect to one another. *See Susnjara, Abstract*. A first member (96) is secured to a second member (21) via three push rods (107, 108, 109) that are slidably mounted in corresponding bores (98, 99, 100) of the first member (96).

See *Susnjara*, FIGS. 9, 10, and 12; and Col. 5, lines 1-4. The push rods (107, 108, 109) thus effect angular displacement of the first member (96) with respect to the second member (21) by sliding back and forth within the bores (98, 99, 100). The opposite end of each push rod (107, 108, 109) is translationally fixed to a guideplate (105) via a link (109a, 110, 106, respectively). See *Susnjara*, FIG. 9. Thus, the first member (96) is angularly displaceable or pivotable with respect to second member (21), but cannot “revolve” about a longitudinal axis of the second member (21).

With respect to the above-quoted recitations of claims 13 and 33, the first member (96) cannot “revolve” with respect to the second member (21) “about the axial path, the axial path extending along a longitudinal axis of” the second member (21). Similarly, the first member (96) cannot “revolve” with respect to the second member (21) “about a longitudinal axis of” the second member (21), as recited in claim 26. Applicants thus respectfully submit that independent claims 13, 26, and 33 are allowable over the references of record.

### ***B. Dependent Claims***

Dependent claims 15, 19, 21, 22, 24, 25, 27, 30, 34-37, and 41 each depend from one of independent claims 13, 26, or 33, and are therefore allowable over the references of record for at least the same reasons described above. Moreover, the dependent claims recite independently patentable subject matter that is neither taught nor suggested by the references of record. As an example, *Susnjara* also fails to teach or suggest “wherein the through hole of the mounting plate allows axial displacement of the line through the mounting plate,” as recited in dependent claim 41.

The Office Action states that “the through hole of the mounting plate allows axial displacement of the line through the mounting plate.” See *Office Action dated 12/10/2008*, page 3. Applicants respectfully disagree. The only figure of *Susnjara* that shows a “line” passing through the mounting plate (105) is Figure 11, where the line is shown extending between mounting plate (105) and support block (96). See *Susnjara*, FIG. 11. The line is secured directly to the mounting plate (105) at one end, and is not axially displaceable “through the mounting plate.” See *Susnjara*, FIG. 11. Moreover, *Susnjara* could not be modified to allow “axial

displacement of the line through the mounting plate,” as any through-hole formed in the mounting plate (105) would cause wear upon the line. In other words, while the line could possibly be flexible between the first and second members (21, 96), the line is fixedly secured to the mounting plate (105). The line could not be axially displaceable “through the mounting plate” because the line would rub upon edges of the through hole and/or mounting plate during the angular pivoting of the first member (96) with respect to the second member (21) describe above, and for which Susnjara is expressly designed. Accordingly, Applicants respectfully submit that claim 41 is allowable over the references of record for at least this additional reason.

**CONCLUSION**

In view of the above, each of the presently pending claims in this application is believed to be in condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 18-0013, under Order No. 66835-0003 from which the undersigned is authorized to draw.

Dated: March 10, 2009

Respectfully submitted,

Electronic signature: /Stefan D. Osterbur/  
Stefan D. Osterbur

Registration No.: 57,954

Thomas E. Bejin

Registration No.: 37,089

RADER, FISHMAN & GRAUER PLLC

Correspondence Customer Number: 10291

*Attorneys for Applicant*